UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

| |) |
|----------------------------|-------------------------|
| In re: |) Chapter 9 |
| |) |
| CITY OF DETROIT, MICHIGAN, |) Case No. 13-53846 |
| |) |
| Debtor. |) Hon. Steven W. Rhodes |
| |) |

CERTIFICATE OF SERVICE

The undersigned certifies that on November 13, 2013, The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees filed *AFSCME's Supplemental Brief on Good Faith Negotiations* [Docket No. 1695] with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: November 13, 2013

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